IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

:

ABIB SARAJUDDIN,
Petitioner, :

CIVIL ACTION (Habeas Corpus)

v. :

No: 1:05-CV-01000(PLF)

GEORGE W. BUSH, *et al.*, Respondents.

UNOPPOSED MOTION FOR ENTRY OF PROTECTIVE ORDERS

Petitioner hereby moves for entry of the standard protective orders and avers the following:

- 1. On May 18, 2005, Petitioner's pro se Petition for a Writ of Habeas Corpus was docketed with this Court.
- 2. On July 18, 2005, the government filed a *Motion to Stay the Proceedings Pending Related Appeals and for Coordination*.
- 3. On October 14, 2005, the Court appointed the Federal Defender Office for the District of Connecticut to represent Petitioner and on November 15, 2005, counsel filed a notice of appearance.
- 4. On November 8, 2004, the Court entered a protective order in several related cases that have become standard in this type of litigation. See In re Guantanamo Detainee Cases, 344 F.Supp. 2d 174 (D.D.C. 2004). On November 10, 2004, and December 13, 2004, the Court entered two additional orders related to the November 8th order. Respectfully, Petitioner moves to extend these orders to this case as well.

- 5. It is Petitioner's understanding that counsel for the government has no objection to this motion.
- 6. For the Court's convenience, Petitioner has attached with this motion, a proposed order granting Petitioner's request.

Respectfully submitted,

Dated: December 13, 2005

Thomas P. Belsky Asst. Federal Defender 2 Whitney Ave., Suite 300 New Haven, CT 06510 Bar No. ct24770 (203) 498-4200

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Certificate of Service

I hereby certify that a true and correct copy of the foregoing instrument has been served via the e-filing system and regular mail to the following counsel of record for respondents:

Terry Marcus Henry

U.S. Department of Justice, Civil Division 20 Massachusetts Avenue, N.W. Room 7144 Washington, DC 20530

/s/ Thomas P. Belsky

Dated: December 13, 2005